



March 3, 2010

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Subject: Comments on Part 704 Corporate Credit Unions

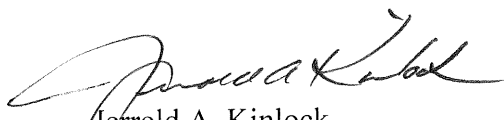
Dear Ms. Rupp:

Sacramento Credit Union, with assets of \$320 million, relies upon the products and services of the corporate system to enhance member value and to achieve short term and long term strategic goals. On behalf of the 26,000 members of Sacramento Credit Union, I express appreciation for the efforts put forth by the NCUA to improve and strengthen the corporate system via amendment of Part 704 Corporate Credit Unions. However, if enacted, certain provisions will be detrimental to the operation and success of our credit union.

As a credit union CEO for nearly 30 years and early adopter of interest rate risk modeling, I believe it would be nearly impossible for a corporate credit union to provide services to natural person credit unions and not allow the net economic value to decline more than 15%. Secondly, the recapitalization of the corporate credit union system by natural person credit unions was not subject to legacy losses prior to 2009. I view these two points critical to the corporate system's ability to function and provide services.

Thank you for the opportunity to express our opinions during this comment period.

Sincerely,



Jerrold A. Kinlock
President/CEO

JAK/sah